

BOULT
CUMMINGS
CONNERS
& BERRY
PLC

Henry Walker
(615) 252-2363
Fax: (615) 252-6363
Email: hwalker@bccb.com

LAW OFFICES
414 UNION STREET, SUITE 1600
POST OFFICE BOX 198062
NASHVILLE, TENNESSEE 37219

February 15, 2001

REC'D TN
REGULATORY AUTH.

*01 FEB 16 AM 10 45

OFFICE OF THE
EXECUTIVE SECRETARY
TELEPHONE (615) 244-2582
FACSIMILE (615) 252-2380
Internet: www.bccb.com/

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
360 James Robertson Parkway
Nashville, TN 37201

Re: Tariff Filings by all Telephone Companies Regarding Reclassification of
Pay Telephone Service as Required by FCC Order 96-439
Docket No. 97-00409

Dear Mr. Waddell:

The Authority has requested comments from the parties to the above-captioned proceeding concerning whether or not the TRA should "de-average" rates for payphone lines.

The Tennessee Payphone Owners Association ("TPOA") agrees with the comments expressed in the TRA's Initial Order of February 1, 2001, that average rates will promote the widespread availability of payphones in rural areas, consistent with the goals of state and federal law.

Therefore, TPOA supports average, state-wide payphone rates for each local exchange carrier.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
Henry Walker

HW/nl
Enclosure
c: Parties